

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

JOHN STEPHEN MAXWELL, xxx-xx-8628)	Case No. 12-02901-KL2-13
799 Spring Park Drive, Cookeville TN 38501,)	Judge Keith M. Lundin
Debtor)	Chapter 13

RESPONSE TO TRUSTEE'S MOTION TO CONVERT TO CHAPTER 7
FOR FAILURE OF DEBTOR TO FUND PLAN

Debtor admits the default in his plan payments. Debtor's income has been reduced. However, Debtor expects to receive sufficient income such that he can bring his plan current by September 30, 2015. Therefore, Debtor requests that the Trustee's Motion be denied and that his plan be allowed to continue on probation.

By /s/ Dale Bohannon
Dale Bohannon, BPR 4662
Attorney for Debtor
115 South Dixie Avenue
Cookeville, TN 38501
931-526-7868 (Telephone)
931-528-3418 (Fax)
Email: dbohannon@dbohannon.net

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2015, the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to the Chapter 13 Trustee and U.S. Trustee, as indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

By /s/ Dale Bohannon